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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,	)	
	)	Case No.: 2:16-cr-0030-JAD-CWH
Plaintiff,	)	
	)	STIPULATION TO CONTINUE
vs.	)	SENTENCING
	)	(Second Request)
JULIAN CRUZ-FLORES,	)	
	)	
Defendant.	)	
	)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United States Attorney; Susan Cushman, Assistant United States Attorney, counsel for the United States of America and Mace Yampolsky, Esq., counsel for defendant, that sentencing in the above-captioned matter currently scheduled to commence on Monday, March 6, 2017, at 10:00 a.m. be vacated and continued to a date and time convenient to all parties, but no earlier than 60 days.

This Stipulation is entered into for the following reason:

1. The government needs additional time to determine whether there will be a recommendation for a two-level reduction in the defendant's base offense level for a group plea pursuant to *United States v. Caro*, 997 F.2d 657 (9<sup>th</sup> Cir. 1993).

2. The parties agree to the continuance.

1           3. The defendant is in custody and does not object to the continuance.

2           4. This is the second request to continue the sentencing.

3           DATED this 23rd day of February 2017.

4                               Respectfully submitted,

5                               DANIEL G. BOGDEN  
6                               United States Attorney

7                               */s/ Susan Cushman*

8                               \_\_\_\_\_  
9                               SUSAN CUSHMAN  
                              Assistant United States Attorney

10                              */s/ Mace Yampolsky*

11                              \_\_\_\_\_  
12                              MACE YAMPOLSKY  
13                              Counsel for Defendant

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Defendant.

## ORDER TO CONTINUE SENTENCING

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